

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 23-cv-61256-JB/JMS

MONARCH AIR GROUP, LLC,

Plaintiff,

v.

JOURNALISM DEVELOPMENT
NETWORK, INC.,

Defendant.

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**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO FILE
SUMMARY JUDGMENT DOCUMENTS UNDER SEAL**

Pursuant to S.D. Fla. Local Rule 5.4, the parties’ Joint Motion for Entry of Stipulated Confidentiality Order [ECF No. 74-1], and the Court’s Confidentiality Order [ECF No. 75], Defendant Journalism Development Network, Inc. (“JDN”) hereby moves for the entry of an order permitting JDN to file unredacted versions of its forthcoming Motion for Summary Judgment, Statement of Material Facts, and supporting exhibits, under seal. In support, JDN states:

1. As provided by the Confidentiality Order, the parties have designated various portions of numerous depositions and other discovery materials, including particular documents and interrogatories, as “confidential” and/or “attorney’s eyes only.” [ECF Nos. 74-1, 75] These materials include, among other things, testimony and documents concerning financial information of Plaintiff.

2. JDN will be filing its Motion for Summary Judgment, Statement of Material Facts and supporting evidence by June 23, 2025 as required. [ECF No. 151] Although the majority of its discussion, argument and supporting evidence is non-confidential and will be publicly

available, JDN's summary judgment filings will cite and reference portions of testimony and materials designated as confidential or attorney's eyes only -- primarily by Plaintiff. Given these confidentiality designations, JDN is currently unable to include such information in a public filing under the Confidentiality Order.

3. To the extent that JDN files or references materials that have been designated as confidential or attorney's eyes only, its publicly-available filings will redact only this information.

WHEREFORE, Defendant Journalism Development Network, Inc. respectfully requests entry of an order permitting it to file unredacted versions of its Motion for Summary Judgment, Statement of Material Facts and specified supporting evidence under seal.

GOOD FAITH CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Undersigned counsel certifies that she conferred with counsel for Plaintiff concerning the relief sought in this motion, who advised that Plaintiff does not oppose such relief.

THOMAS & LOCICERO PL

By: /s/ Daniela Abratt-Cohen

Dana J. McElroy

Florida Bar No. 845906

dmcelroy@tlolawfirm.com

Daniela Abratt-Cohen

Florida Bar No. 118053

dacohen@tlolawfirm.com

915 Middle River Drive, Suite 309

Fort Lauderdale, FL 33304

Phone: (954)703-3417

James J. McGuire

Florida Bar No. 187798

jmcguire@tlolawfirm.com

601 South Boulevard

Tampa, FL 33606

Phone: (813) 984-3060

*Attorneys for Defendant Journalism
Development Network, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **6th** day of **June, 2025**, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties and counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Electronic Filing.

/s/ Daniela Abratt-Cohen
Attorney